

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

15CV1060

NIMRA BUTT

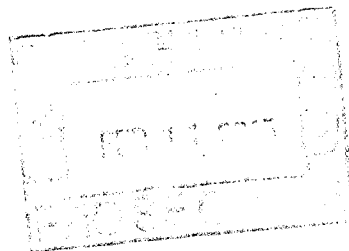
(In the space above enter the full name(s) of the plaintiff(s).)

COMPLAINT

-against-

THE CITY OF NEW YORKDOC OFFICIALS -- ("SEE ATTACHED")OFFICER CAPERSOFFICER K. HALLOFFICER HARVEYOFFICER JANE DOE # 1OFFICER JANE DOE # 2Jury Trial: ☒ Yes ☐ No
(check one)"ALL SUED IN THEIR INDIVIDUAL CAPACITIES"

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)



I. Parties in this complaint:

- A. List your name, address and telephone number. If you are presently in custody, include your identification number and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff Name NIMRA BUTT
 Street Address 79 WINDSOR STREET
 County, City KEARNY
 State & Zip Code NEW JERSEY
 Telephone Number (347) 262-1285

- B. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1 Name "SEE ATTACHED FOR LIST OF ALL DEFENDANTS"
 Street Address _____

County, City _____
 State & Zip Code _____
 Telephone Number _____

Defendant No. 2 Name "SEE ATTACHED"
 Street Address _____
 County, City _____
 State & Zip Code _____
 Telephone Number _____

Defendant No. 3 Name "SEE ATTACHED"
 Street Address _____
 County, City _____
 State & Zip Code _____
 Telephone Number _____

Defendant No. 4 Name "SEE ATTACHED"
 Street Address _____
 County, City _____
 State & Zip Code _____
 Telephone Number _____

II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. Only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case.

A. What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal Questions

☐ Diversity of Citizenship

B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? FOURTH, FIFTH, NINTH, AND FOURTEENTH AMENDMENTS TO
CONSTITUTION OF THE UNITED STATES AND 42 U.S.C. SECTION 1983.

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship _____

Defendant(s) state(s) of citizenship _____

III. Statement of Claim: "SEE ATTACHED FOR STATEMENT OF CLAIM"

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events.

You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? "SEE ATTACHED"

B. What date and approximate time did the events giving rise to your claim(s) occur? "SEE ATTACHED"

C. Facts: "SEE ATTACHED"

What happened to you?

Who did what?

Was anyone else involved?

Who else saw what happened?

IV. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received. THE PLAINTIFF SUSTAINED INJURIES TO HER EMOTIONAL AND PHYSICAL WELL-BEING. PLAINTIFF CLAIMS DAMAGES FOR PAIN AND SUFFERING, EMOTIONAL DISTRESS, AND DIVERSE GENERAL AND SPECIAL DAMAGES.

THE FOLLOWING

IN SUPPORT OF CAPTION

"DOC OFFICIALS" :

1. THE COMMISSIONER
2. DEPUTY COMMISSIONER OF INVESTIGATION
3. CHIEF OF DEPARTMENT
4. DEPUTY CHIEF OF DEPARTMENT
5. ASSISTANT CHIEF OF SECURITY
6. GMDC WARDEN
7. GRVC WARDEN

THE FOLLOWING

IN SUPPORT OF:

I. PARTIES IN THIS COMPLAINT

"LIST OF DEFENDANTS"

I. PARTIES IN THIS COMPLAINT

B. DEFENDANTS

DEFENDANT NO. 1

NAME: THE CITY OF NEW YORK

STREET ADDRESS: 1 CENTRE STREET Room 1200

COUNTY, CITY: NEW YORK

STATE AND ZIP: NEW YORK 10007-2341

TELEPHONE #: (212) 669-4445

I. PARTIES IN THIS COMPLAINT

B. DEFENDANTS

DEFENDANT NO. 2

NAME: DOC OFFICIALS (THE COMMISSIONER, DEPUTY COMMISSIONER OF INVESTIGATION,
CHIEF OF DEPARTMENT, DEPUTY CHIEF OF DEPARTMENT, ASSISTANT CHIEF OF
SECURITY, GMDC WARDEN, AND GRUC WARDEN)
STREET ADDRESS:

COUNTY, CITY:

STATE AND ZIP:

TELEPHONE #:

"ALL NOTIFIED OF CLAIMS VIA 3-1-1 COMPLAINT AND DIRECT
COMPLAINTS AND DID NOTHING"

I. PARTIES IN THIS COMPLAINT

B. DEFENDANTS

DEFENDANT NO. 3

NAME: OFFICER CAPERIS -- WHOM CONDUCTED SEARCHES OF VISITOR'S
ON AND ABOUT AUGUST, 2014 - NOVEMBER, 2014 IN G.M.D.C. VISITOR
ENTRY.
STREET ADDRESS:

COUNTY, CITY:

STATE AND ZIP:

TELEPHONE #:

I. PARTIES IN THIS COMPLAINT

B. DEFENDANTS

DEFENDANT NO. 4

NAME: OFFICER K. HALL (# 1167) -- CAPTAIN WHOM SUPERVISED OFFICER CAPERS IN
G.M.D.C. VISITORS ENTRY HALL ON AND ABOUT AUGUST, 2014 -- NOVEMBER, 2014.

STREET ADDRESS:

COUNTY, CITY:

STATE AND ZIP:

TELEPHONE #:

I. PARTIES IN THIS COMPLAINT

B. DEFENDANTS

DEFENDANT NO. 5

NAME: OFFICER HARVEY -- CAPTAIN WHOM SUPERVISED OFFICERS JANE
DOE # 1 AND # 2 ON AND ABOUT DECEMBER, 2014 -- FEB, 2014 IN G.R.V.C.
VISITOR ENTRY.

STREET ADDRESS:

COUNTY, CITY:

STATE AND ZIP:

TELEPHONE #:

I. PARTIES IN THIS COMPLAINT

B. DEFENDANTS

DEFENDANT NO. 6

NAME: JANE DOE #1 -- OFFICER WHOM CONDUCTED SEARCHES ON FEMALE VISITORS ENTERING GRVC VISITING HALL ON OR ABOUT DEC., 2014 - FEB., 2014.

STREET ADDRESS:

COUNTY, CITY:

STATE AND ZIP:

TELEPHONE #:

I. PARTIES IN THIS COMPLAINT

B. DEFENDANTS

DEFENDANT NO. 7

NAME: JANE DOE # 2 -- OFFICER R WHOM CONDUCTED SEARCHES ON
FEMALE VISITORS ENTERING GRVC VISITING HALL ON OR ABOUT
DEC., 2014 - FEB., 2014.

STREET ADDRESS:

COUNTY, CITY:

STATE AND ZIP:

TELEPHONE #:

THE FOLLOWING

IN SUPPORT OF:

III. STATEMENT OF CLAIM

#1, #2, AND #3 WITH
EXHIBITS IN SUPPORT THEREOF
FOR #3

III. STATEMENT OF CLAIM:

1

A. WHERE DID THE EVENTS GIVING RISE TO YOUR CLAIM?

GEORGE MOTCHAN DETENTION CENTER ON RIVERS ISLAND :
15-15 HAZEN STREET, EAST ELMHURST, NEW YORK 11370.

B. WHAT DATE AND APPROXIMATE TIME DID THE EVENTS GIVING RISE TO YOUR CLAIM OCCUR?

AUGUST 27, 2014 AT APPROXIMATELY VISITATION HOURS.

C. FACTS:

[WHAT HAPPEN TO YOU?]:

PLAINTIFF WAS A VISITOR VISITING AN INMATE AT THE AFOREMENTIONED FACILITY. THE PLAINTIFF HAS NO HISTORY OF SMUGGLING CONTRABAND OR OF DISRUPTIVE BEHAVIOR. OFFICER CAPENS UNLAWFULLY AND WITHOUT ANY CAUSE CONDUCTED A STRIP SEARCH AND BODY CAVITY SEARCH ON PLAINTIFF. OFFICER CAPENS WHILE WEARING SAME GLOVES OF PRIOR SEARCHES STRETCHED THE FRONT AND BACK OF THE PLAINTIFF'S PANTS OUT TO OBTAIN A COMPLETE VIEW OF THE PLAINTIFF'S PRIVATE AREAS NAMELY THE GENITALIA. DURING THE STRIP SEARCH OFFICER CAPENS BEGAN TO PUSH, PROBE, TAP AND EVEN SLIGHTLY PENETRATE THE PLAINTIFF'S GENITALIA -- CAVITY SEARCH. PLAINTIFF REPORTED UNLAWFUL SEARCH TO AREA CAPTAIN, HALL. CONSENT WAS NEVER AN OPTION WHEN OFFICER CAPENS GAVE DIRECT ORDER TO STAND STILL WITH LEGS APART.

[WHO DID WHAT?]:

OFFICER CAPENS SUBJECTED PLAINTIFF TO AN UNLAWFUL STRIP SEARCH AND BODY CAVITY SEARCH. IN VIOLATION OF A CLEARLY ESTABLISHED RIGHT.

[WAS ANYONE ELSE INVOLVED?]:

CAPTAIN HALL, AS SHE DID NOTHING WHEN THE PLAINTIFF IMMEDIATELY INFORMED HER OF THE UNLAWFUL INTRUSIVE SEARCH.

[WHO ELSE SAW WHAT HAPPEN?]:

THE AREA WHERE THE SEARCHES ARE CONDUCTED ARE PRIVATE.

III. STATEMENT OF CLAIM:

2

A. WHERE DID THE EVENTS GIVING RISE TO YOUR CLAIM?

GEORGE NOTCHAN DETENTION CENTER ON RICKENS ISLAND :
15-15 HAZEN STREET, EAST ELMHURST, NEW YORK 11370.

B. WHAT DATE AND APPROXIMATE TIME DID THE EVENTS GIVING RISE TO YOUR CLAIM OCCUR?

OCTOBER 2, 2014 AT APPROXIMATELY VISITATION HOURS

C. FACTS:

[WHAT HAPPEN TO YOU?]:

PLAINTIFF WAS A VISITOR VISITING AN INMATE AT THE AFOREMENTIONED FACILITY. THE PLAINTIFF HAS NO HISTORY OF SMUGGLING CONTRABAND OR OF DISRUPTIVE BEHAVIOR. OFFICER CAPENS UNLAWFULLY AND WITHOUT ANY CAUSE CONDUCTED A STRIP SEARCH AND BODY CAVITY SEARCH ON PLAINTIFF. OFFICER CAPENS WHILE WEARING SAME GLOVES OF PRIOR SEARCHES STRETCHED THE FRONT AND BACK OF THE PLAINTIFF'S PANTS OUT TO OBTAIN A COMPLETE VIEW OF THE PLAINTIFF'S PRIVATE AREAS NAMELY THE GENITALIA. DURING THE STRIP SEARCH OFFICER CAPENS BEGAN TO PUSH, PROBE, TAP AND EVEN SLIGHTLY PENETRATE THE PLAINTIFF'S GENITALIA -- CAVITY SEARCH. PLAINTIFF REPORTED UNLAWFUL SEARCH TO AREA CAPTAIN HALL. CONSENT WAS NEVER AN OPTION WHEN OFFICER CAPENS GAVE DIRECT ORDER TO STAND STILL WITH LEGS APART.

[WHO DID WHAT?]:

OFFICER CAPENS SUBJECTED PLAINTIFF TO AN UNLAWFUL STRIP SEARCH AND BODY CAVITY SEARCH. IN VIOLATION OF A CLEARLY ESTABLISHED RIGHT.

[WAS ANYONE ELSE INVOLVED?]:

CAPTAIN HALL, AS SHE WAS NOTIFIED TWICE IMMEDIATELY AFTER THE UNLAWFUL INTRUSIVE SEARCH.

[WHO ELSE SAID WHAT HAPPEN?]:

THE AREA WHERE THE SEARCHES ARE CONDUCTED ARE PRIVATE.

III. STATEMENT OF CLAIM:

3

A. WHERE DID THE EVENTS GIVING RISE TO YOUR CLAIM?

"G.R.V.C" ON RIVERS ISLAND: 09-9 HAZEN STREET,
EAST ELMHURST, NEW YORK, 11370.

B. WHAT DATE AND APPROXIMATE TIME DID THE EVENTS GIVING RISE TO YOUR CLAIM OCCUR?

DECEMBER 12, 2014 AT APPROXIMATELY VISITATION HOURS.

JANUARY 29, 2014 . . . ON GOING . . . SAME FACTS-VIEWING GENITALIA

JANUARY 30, 2014 . . . ON GOING . . . SAME FACTS-VIEWING GENITALIA

C. FACTS:

[WHAT HAPPEN TO YOU?]:

PLAINTIFF WAS A VISITOR VISITING AN INMATE AT THE AFOREMENTIONED FACILITY. THE PLAINTIFF HAS NO HISTORY OF SMUGGLING CONTRABAND OR OF DISRUPTIVE BEHAVIOR. OFFICER JANE DOE #1 AND OFFICER JANE DOE #2 UNLAWFULLY AND WITHOUT ANY CAUSE CONDUCTED A STRIP SEARCH ON PLAINTIFF. JANE DOE #1 AND #2 INSTRUCTED FOR THE PLAINTIFF TO LET HER HAIR OUT TO REMOVE BOTH SHIRTS AND TO LIFT UP HER DRESS. AT THIS POINT JANE DOE #1 PULLED THE PLAINTIFF'S PANTIES BACK AND FORTH TO VIEW PLAINTIFF'S GENITALIA. ALSO, JANE DOE #1 PHYSICALLY ALSO BEGAN TO LOOK THROUGH PLAINTIFF'S BRA WHILE SHE STILL WORE IT. PLAINTIFF REPORTED UNLAWFUL SEARCH TO AREA CAPTAIN HARVEY. PLAINTIFF ALSO ADVISED THE CITY OF NEW YORK AND D.O.C. OFFICIALS VIA 3-1-1 COMPLAINTS AND BOARD OF CORRECTION COMPLAINT. SEE ATTACHED. CONSENT WAS NOT AN OPTION WHEN OFFICERS GAVE DIRECT ORDER TO COMPLY OR VISIT BE SUSPENDED.

[WHO DID WHAT?]:

OFFICER JANE DOE #1 AND OFFICER JANE DOE #2 SUBJECTED PLAINTIFF TO AN UNLAWFUL STRIP SEARCH IN VIOLATION OF A CLEARLY ESTABLISHED RIGHT.

[WAS ANYONE ELSE INVOLVED?]:

CAPTAIN HARVEY, D.O.C. OFFICIALS, THE CITY OF NEW YORK, AS THEY WERE ALL NOTIFIED VIA COMPLAINTS. "SEE ATTACHED"

[WHO ELSE SAW WHAT HAPPEN?]:

THE AREA WHERE THE SEARCHES ARE CONDUCTED ARE PRIVATE.

THE FOLLOWING

IN SUPPORT OF:

ATTACHMENTS FOR

STATEMENT OF CLAIM # 3

Print

Close

City of New York Auto Acknowledgment Correspondence # 1-1-1044833623

From: reply@customerservice.nyc.gov
Sent: Sat 12/13/14 10:39 AM
To: NIMRAK013@HOTMAIL.COM

Dear NIMRA BUTT:

Thank you for contacting the City of New York. Your message has been forwarded to the appropriate agency for review and handling.

For future reference, your service request number is 1-1-1044833623.

Sincerely,

The City of New York

This is an auto-generated system message. Please do not reply to this message. Messages received through this address are not processed.

Thank you.

The information you have provided is as follows:

Form: Customer Comment

Topic: Visiting Rikers Island

Name: NIMRA BUTT

Street Address: 63 HILLSIDE LANE

City, State Zip: LONG ISLAND, NY 11040

Country:

Email: NIMRAK013@HOTMAIL.COM

Company:

Work Phone: (347) 262-1285

Message:

CALLER WANTS TO COMPLAINT ABOUT HOW SHE WAS STRIP SEARCH WITHOUT GIVEN A CONSENT FORM AT THE GRVC FACILITY AT RIKERS ISLAND. THEY SEARCH HET BY TAKING OFF BOTH SHIRTS AND TANK TOP

AND REMOVE HER UNDER GARMENTS AND STILL PUT THE CALLER IN A BOTH AND AFTER THE CALLER DID ALL OF THAT THE CORRECTION OFFICER CANCELED HER VISIT,SAYING THAT THE CALLR TOOK TO LONG TO GET OF THE BOOTH THIS HARASSMENT BEEN ON GOING.

« Search ► Message

Urgent Assistance Needed (Visitor Appeal) vs. Rikers Island GRVC

Reply ▼ Delete More ▼

Nimra Khawaja

Mon

Show details



— Your Scanned Document(...zip (218.9 KB))

— Your Scanned Document(...zip (904.8 KB))

— Your Scanned Document(...zip (556.4 KB))

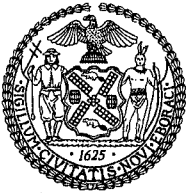
Dear NYC Board Of Corrections,

My name is Nimra Butt, and I reside at 63 Hillside Lane, New Hyde Park, NY 11040. My fiancée's name is Elmo Rivadeneira, Booking Case#- 310-1300-714. This would be the third appeal that I am writing to the board, but this time for the second time my visits have been unlawfully restricted/cancelled for 45 days. Alas, I don't have the appeal forms because the C.O.'s at the GRVC facility would not give me one. I am hopeful that you will assist me in getting one, or maybe have access to view it. I have been making several complaints to 311 over the past 3-4 months about numerous issues that my fiancée and I have been having to face, in violation to our rights. Along with these phone calls, I have contacted the Mayor, Commissioner via email and The Public Advocate and the Investigation Bureau which i will be following up with today Monday, December 15th, 2014 in regards to this cancellation. I have attached every call that I have made after my first cancellation occurred because the harassment never stopped. In my second appeal which i attached as well, I explained specific situations that occurred, as well as what happened the day/night Corrections told my fiancée to pack up to move him to the facility he is currently in, GRVC. On Friday December 12th, 2014, I had a visit with my fiancée Elmo. At first, I was being falsely accused of bringing in drugs. Without being given a consent form, for the sake of my visits, I did exactly what I was told. The 2 female C.O.'s whose names I am unsure of since I am new to the facility, said things like, "We'll bring the dogs up here", "We're gonna put you through an X-ray machine", "We'll get the Captain in here, and she'll do as we say, because shes worse than us, she doesn't have a heart". These things were said to me, so I could be stripped search.. Regardless of all the things they said, I agreed and let them have their way because I only care about seeing my fiancée. She made me take off my shirt, and than told me to take off my tank top, then she literally pulled my underwear back and forth and looked inside. She even felt through my whole bra. My shoes were already off and hair was open. Even after all of this, they continued to persecute. My response was, "I don't know what else your expecting from me, I did exactly what i was told", I even said they could seat me in the front by the officers in the room. Their decision after all the useless abuse was to place me inside of a booth. To me it didn't matter where I was put, as long as I got to see and speak to my fiancée. We were put at the furthest booth in the corner, and as you might already be aware that it is extremely difficult to hear each other in those booths, your ears must be as close to the tiny holes as possible. When the visits were close to ending (we were not given a whole hour) the same C.O. who cancelled my visits, was calling names from down the hall. Hence, she did not bother to come inside and tell us, me specifically since i was in the furthest corner booth. I didn't hear her the first time because my

ears were towards the holes, and my fiancée was speaking me to me, but the second time she was saying something, I heard her call out my fiancée's name, so I quickly made my way out. When I stepped outside she said, "Your visits are cancelled for 45 days" I asked her for what, and she responded, "You didn't come out fast enough". These words are inaccurate because I came out as swiftly as possible, and certainly it was going to take me longer than everyone else exiting because I was sitting at the end. I really don't follow this procedure of just being able to take away someones rights without proper justification. I have read the manual which clearly states all the rules that Corrections is supposed to follow. No where does it state that my rights can be taken away from me because I "didn't come out fast enough". Logically, this doesn't even make sense. Previous to this happening, I saw Officer Capers in the entrance of the building, somewhere I never used to see her and she was giving me nasty looks every time she saw me. I have mentioned this in my second appeal written on Wednesday, September 3rd, 2014. It is safe to say, she is familiar with C.O.'s from The GRVC Facility because the way I was being treated continued even in this current facility. That explains the cause for the second appeal that I wrote. Due to the active law suit, she is trying her best to torture my fiancée and I while she has the chance. I'm not trying to blame her, but I don't see no other explanation for my cancellation. I've been trying to marry my fiancée for the past 3-5 months now, which means these visits are extremely significant to me. There's nothing in this world that I would do or say to get them taken away from me. I even cried to all the C.O.'s and asked them why they did this to me. All but I had an answer. "Oh, she's the cancelling your visits, She's a B****, no matter what you say, she'll do it regardless". I even tried speaking to the GRVC visiting Captain, but as expected, the Captains don't have the slightest bit of consideration of what the visitors have to say, instead they go against us. She made a face at me while i was tearing up, rolled her eyes, and left. I knew at that point that there was nothing I could do. I sat there and missed 3 buses and kept asking for the appeal form, they didn't even give that to me. I was told, "find your own way to get it", we tried giving it to you once, which isn't true. The C.O. literally waived the paper in my face and said "So do you want this paper or not", and walked away. I was also told that if I didn't leave they would get me arrested. This is really uncivil and unprofessional. Why isn't anything being done about the way Corrections is treating visitors. I don't go to Rikers Island to put up an argument with these people, even though I've been violated so many times, I keep quit and look forward to seeing my fiancée. I just want to have my visits back. Please help me get them back, I really did not do anything. Its bad enough that he was moved to the highest classification building because of Capers and my 311 phone calls. This building is a complete disaster, filled with drug addicts and gang members, a group my fiancée doesn't mix in with. It will mean everything to me, if the board assists me in getting my visits back. My birthday is coming up on Christmas Day, I was supposed to see him on the 24th. I'm already extremely upset about that, and to top it off I might miss New Years as well. It wouldn't matter even if i got booth visits for that week, but at least something. Please don't let this happen to me during the holiday season. The fact that I don't react to how I'm being treated and I legally deal with it instead is what bothers the Correction Officers. All I can do is plead to the Board and humbly ask for your help. I've been wanting for someone to help me with these issues. Hopefully the Investigation Department, G.I.'s Office and Public Advocate's Office will be able to help with where my fiancée was placed, how I am being searched and the marriage bureau. If there are any further questions in regards to this case I am available at any day, any time on the following number: 1(347)-262-1285. Thank You for taking out the time to read this.

Respectfully,

Nimra Butt



Michael Aaronson
Chief, Bureau of Law and
Adjustment

015 - 151

THE CITY OF NEW YORK
~~OFFICE OF THE COMPTROLLER~~
CLAIMS AND ADJUDICATIONS
1 CENTRE STREET ROOM 1200
NEW YORK, N.Y. 10007-2341

WWW.COMPTROLLER.NYC.GOV

Scott M. Stringer
COMPTROLLER

Date: 10/30/2014
Claim No: 2014PI032602
RE: Acknowledgment of Claim

NIMRA BUTT
63 HILLSIDE LANE
NEW HYDE PARK, NY 11040

Dear Claimant:

We acknowledge receipt of your claim, which has been assigned the claim number shown above. Please refer to this claim number in any correspondence or inquiry you may have with our office.

We will do our best to investigate and, if possible, settle your claim. However, if we are unable to resolve your claim, **any lawsuit against the City must be started within one year and ninety days from the date of the occurrence.**

If you have any questions regarding your claim, you may contact us at either 212-669-8750 for property damage claims or 212-669-4445 for claims involving personal injury.

Sincerely,
Michael Aaronson

DAVID M. GOLDBERG

P.O. Box 254

AMENIA, NY 12501

(845) 373-8196

In the Matter of the Claim of
Nimra Butt

-Against-

THE CITY OF NEW YORK

NOTICE OF CLAIM

CLAIM # : 2014 PI032602

Please Take Notice that the undersigned claimant hereby makes claim and demand against the City of New York:

1. Name and post office address of claimant:

Nimra Butt

63 Hillside Lane

New Hyde Park, New York 11040

2. The nature of the claim:

Claim for personal and emotional injuries sustained by claimant as a result of intentional, reckless and/or negligent conduct by agents, servant, and employees of the City of New York, and the New York City Department of Corrections. The claimant was subjected to an unlawful search and seizure; unlawful sexually intrusive search; an unlawful strip search; an unlawful body cavity search; retaliation for free speech; gross negligence; malicious prosecution; intentional and negligent infliction of emotional distress; harassment; and to a deprivation of her clearly established constitutional, civil and common law rights. Claimant also alleges negligence and gross negligence in the supervision, training and instruction of such officers, and respondeat superior liability.

3. The time when, the place where, and the manner in which the claim arose:

The following is a summary and does not include all details concerning the incidents.

On or about August 27, 2014 at approximately visitation hours, inside the George Motchan Detention Center ("GMDC"), on Rikers Island, Correctional Officer Capers (badge number unknown) subjected claimant to among other things, an unlawful search and seizure; an unlawful sexually intrusive search; an unlawful strip search; an unlawful body cavity search; intentional and negligent infliction of emotional distress; harassment; and to a deprivation of her clearly established constitutional, civil and common law rights. Claimant was a visitor visiting an inmate at GMDC. The claimant has no history of smuggling contraband or of disruptive behavior. Officer Capers unlawfully and without any cause conducted a strip search and body cavity search on claimant. Officer Capers, while wearing same gloves of prior searches, stretched the front and back of the claimants pants out to obtain a complete view of the claimant's private area namely the claimants genitalia. During the strip search, Officer Capers began to push, probe, tap and even slightly penetrated the claimant's genitalia—cavity search. Claimant reported unlawful search to another officer, name at this time unknown. Consent was never an option when Officer Capers gave direct order to stand still with legs apart. Those officers who did nothing failed to protect her from these actions. See attached Exhibit "A".

As a result of the officer's actions claimant experienced confusion, pain and suffering, fear, an invasion of privacy, psychological pain, emotional distress, mental anguish, embarrassment, and humiliation.

On or about August 29, 2014 at approximately 9:30 PM, inside GMDC, on Rikers Island, Correctional Officer K. Hall (captain, badge number 1107), Officer Capers, and other officers at this time unknown subjected claimant to among other things, retaliation for free speech, malicious prosecution, intentional and negligent infliction of emotional distress, harassment, and to a deprivation of her clearly established constitutional, civil and common law rights. Claimant was a visitor visiting an inmate at GMDC. Claimant while visiting was harassed and falsely accused by both Officer K. Hall and Capers of disrespecting staff. Those officers who did nothing failed to protect her from these actions. See attached Exhibit "B", "C" and "D".

After the August 27, 2014 incident and the above stated incident and pursuant to a conspiracy, correctional officers acting in concert and pursuant to a conspiracy maliciously prepared false reports stating that claimant had disrespected staff. As a result of these false reports, claimant was restricted from visiting her fiancée.

On or about October 2, 2014 at approximately visitation hours, inside the George Motchan Detention Center ("GMDC"), on Rikers Island, Correctional Officer Capers (badge number unknown) subjected claimant to among other things, an unlawful search and seizure; an unlawful sexually intrusive search; an unlawful strip search; an unlawful body cavity search; intentional and negligent infliction of emotional distress; harassment; and to a deprivation of her clearly established constitutional, civil and common law rights. Claimant was a visitor visiting an inmate at GMDC. The claimant has no history of smuggling contraband or of disruptive behavior. Officer Capers unlawfully and without any cause conducted a strip search and body cavity search on claimant. Officer Capers, while wearing same gloves of prior searches, stretched the front and back of the claimants pants out to obtain a complete view of the claimant's private area namely the claimants genitalia. During the strip search, Officer Capers began to push, probe, tap and even slightly penetrated the claimant's genitalia—cavity search. Consent was never an option when Officer Capers gave direct order to stand still with legs apart. Those officers who did nothing failed to protect her from these actions. See attached Exhibit "A".

As a result of the officer's actions claimant experienced confusion, pain and suffering, fear, an invasion of privacy, psychological pain, emotional distress, mental anguish, embarrassment, and humiliation.

The City of New York was aware prior to the aforesaid incident that the officers who violated claimant's rights were insufficiently trained and incompetent. Nevertheless, the City declined to take remedial action.

4. The items of damage or injuries claimed are:

Claimant sustained injuries to her emotional and physical well-being. Claimant claims damages for pain and suffering, emotional distress, and diverse general and special damages. The undersigned claimant presents this claim for adjustment and payment. Unless it is adjusted and paid within the time provided by law from the date of the presentation, the claimant intends to commence an action on the claim.

Dated:

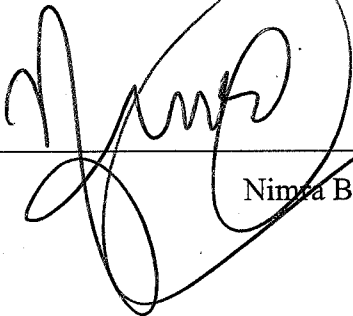
VERIFICATION

State of New York)

:ss:

County of Bronx)

Nimra Butt, being duly sworn, affirms that she is the claimant in the within action, and that her notice of claim is true and accurate.


Nimra Butt

Sworn to before me this 27th
day of October, 2014





Notary Public

THE FOLLOWING

IN SUPPORT OF NEW YORK CITY
NOTICE OF CLAIM

EXHIBIT "A"

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**FW: City of New York - Correspondence #1-1-1021812273
Message to Agency Head, DOC - Other Agency Complaint
(Ref. # 10-265)**

From: **CONSTITUENT SERVICES** (constituentservices@doc.nyc.gov)

Sent: Thu 10/09/14 12:26 PM

To: 'nimrak013@hotmail.com' (nimrak013@hotmail.com)

Dear Ms. Butt,

The New York City Department of Correction received your below correspondence. The details of your correspondence have been forwarded to the appropriate unit within the agency for further investigation.

Thank you for contacting the NYC Department of Correction.

Office of Constituent Services
NYC Department of Correction

-----Original Message-----

From: outgoing agency

Sent: Thursday, October 09, 2014 2:41 PM

To: CONSTITUENT SERVICES

Subject: City of New York - Correspondence #1-1-1021812273 Message to Agency Head, DOC - Other Agency Complaint

Your City of New York - CRM Correspondence Number is 1-1-1021812273

✕ DATE RECEIVED: 10/09/2014 14:26:12

DATE DUE: 10/23/2014 14:40:42

SOURCE: 3-1-1 Call Center

RELATED SR# OR CASE#: N/A

EMPLOYEE NAME OR ID#: OFFICER CAPERS /OFFICER LOPEZ

DATE/TIME OF INCIDENT: 10/09/2014 14:27:13

LANGUAGE NEED:

The e-mail message below was submitted to the City of New York via NYC.gov or the 311 Call Center. It is forwarded to your agency by the 311 Customer Service Center. In accordance with the Citywide Customer Service standard, your response is due in 14 calendar days.

If this message is to a Commissioner / Agency Head and needs to be re-routed to another agency or cc to another agency, forward the email to outgoingagency@customerservice.nyc.gov. Do not make any changes to the subject line. Include any comments and it will be processed by the 311 Customer Service Center.

All other web forms are to be handled by the receiving agency.

Message Type:

Topic: Other Agency Complaint

First Name: NIMRA

Last Name: BUTT

Organization:

Apartment Number:

Street Address: 63 HILLSIDE LANE

City: NEW HYDE PARK

State: NY

Postal Code: 11040



Country:

Work Phone #: 3472621285

Email Address: NIMRAK013@HOTMAIL.COM

Message: THE BOOK AND A CASE # 3101300714 IN THE PAST MONTH THE OFFICER CAPERS TOLD LIES AND GOT THE VISITATION CANCEL OF THE CALLER BECAUSE OF A GREEN SHIRT SHE SAID THE CALLER REFUSED. WHEN SHE SEARCHES THE CALLERS SHE TAPS HER VIRGINIA AND ONLY SEARCHES THE CALLER ONLY. OFFICER CAPERS MAKES PEOPLE WAIT FOR VISITATION BASED ON HER MOOD. SHE HAS PEOPLE STAND THERE WHILE SHE EATS OR CLEANS AND WILL NOT CALL THEM IN THE ROOM. OFFICER LOPEZ PUTS THE CALLER AND HER FIANCE AT THE TOP OF THE VISITING ROOM AND THEY HAVE TO SIT RED AND GREEN AREA WHICH THE FIANCE IS NOT ISSUED A RED OR GREEN ID. THERE IS A LOT OF FAVORITISM AND THE CALLER AND HER FIANCE ARE ALWAYS GIVEN A HARD TIME.

EXHIBIT “B”

	CORRECTION DEPARTMENT CITY OF NEW YORK	FORM : EFF. : REF. :	Page 1 of 2 Pages	
NOTICE TO INMATE/VISITOR OF CANCELLATION / LIMITATION / DENIAL OF VISITING PRIVILEGES				

SECTION I - Inmate's Information

Inmate's Name (Last, First): RIVADENEIRA, ELMO Facility: GMDC Housing Area: 1UA Gender: M
 NYSID #: 12359149N Book and Case / Sentence #: 3101300714

SECTION II - Visitor's Information

Visitor's Name (Last, First): BUTT, NIMRA Date and Time: 08/29/2014 09:30
 Visitor's Birthday: 12/25/1991 Relationship to Inmate: FRIEND Gender: F
 Street Address: 7547 EXTON ST City: DARIEN State: NY Zip: 60561

SECTION III - Inmate and/or Visitor Cancellation / Limitation / Denial

The Visit Supervisor's recommendation for above named visitor or inmate:

☒ CANCELLATION ☐ LIMITATION (non-contact) ☒ DENIAL
☐ Above named visitor ☐ All Visitors ☐ Above named inmate ☒ All inmates
 For a period of 45 days, commencing: 08/29/2014 ending: 10/13/2014

The recommendation to cancel / limit / deny the above inmate's or visitor's visitation rights is based on the following:

☒ Actions by the Inmate ☒ Actions by the Visitor ☐ Actions by the Inmate and Visitor
☐ Inmate/Visitor observed passing contraband ☐ Inmate/Visitor in possession of contraband
☐ Inmate Transferred/Discharged ☐ Medical ☐ Visitor refuse to wait ☐ Out to court
☐ Pending investigation ☐ Inappropriate attire ☐ Inmate refused visit ☐ Failed ion scan
☐ Invalid/Expired ID ☒ Disrespect Staff ☐ Refuse to obey rules and regulations ☐ Other



Details: VISITOR BUTT, NIMRA WAS INFORMED SHE NEEDED A DOC GREEN COVER UP FOR INAPPROPRIATE ATTIRE SAID VISITOR TOLD CO CAPERS FUCK YOU AND YOUR GREEN SHIRT

This cancellation / limitation / denial conforms to the Cancellation / Limitation / Denial Grid (below), based on the circumstances noted above and, when applicable based on the visitor's restriction history (Section V) or based solely on the extenuating circumstances.

Recommended by: _____ Approved by: _____
 Visit Supervisor (Print Name, Rank, Shield / Signature) Tour Commander / Deputy Warden of Programs (Print Name, Rank, Shield / Signature)

SECTION IV - Visitor Cancellation / Limitation / Denial Grid (Check One)

Offense	1st Offense	2nd Offense	3rd Offense
<input checked="" type="checkbox"/> Visit cancelled (Limited to non-contact (Current visit).	N/A	N/A	N/A
<input type="checkbox"/> Promoting Prison Contraband - (Weapons, Narcotics, Marijuana, or controlled substance) When a visitor is found to be in possession of dangerous contraband, that visitor's right to visit any inmate in any facility shall be limited/denied.	1 year		
<input type="checkbox"/> Possession or Promotion of Prison Contraband - (Money, Electronic Devices, tobacco related items, and other Prohibited Items) When a visitor is found to be in possession of this type of contraband, such as cell phones, cameras, papers, hypodermic needles, tobacco & related products such as matches/lighters, etc., that visitor's right to visit any inmate in any facility shall be limited/denied.	180 days	1 year	
<input type="checkbox"/> When a visitor assaults staff, an inmate or another visitor, that visitor's right to visit any inmate in any facility shall be denied.	180 days	1 year	
<input checked="" type="checkbox"/> When a visitor threatens or verbally abuses staff or another visitor or causes a disturbance that puts staff in imminent danger, that visitor's right to visit any inmate in any facility shall be limited/denied.	45 days	90 days	1 year
<input type="checkbox"/> Any visitor who presents false ID or attempts to impersonate another person or otherwise fails to follow the instructions of staff (i.e. refusal to submit to security procedures, such as) and thereby causes disruption of the visit process, shall have his/her right to visit any inmate in any facility limited/denied.	45 days	90 days	1 year
<input type="checkbox"/> Any visitor who is found to have stolen property, or who commits an act of vandalism while on Department of Correction property, shall have his/her right to visit any inmate in any facility limited/denied.	90 days	180 days	1 year
<input type="checkbox"/> Any visitor or inmate who is found to be in possession of any item(s) that is considered contraband, (i.e. food, beverages, gum, metro card); shall have his/her right to a visit in any facility limited to a booth visit.	30 days	60 days	1 year

	CORRECTION DEPARTMENT CITY OF NEW YORK	FORM : EFF. : REF. :	Page 2 of 2 Pages	
	NOTICE TO INMATE/VISITOR OF CANCELLATION / LIMITATION / DENIAL OF VISITING PRIVILEGES			

SECTION V - Visitor Restriction History

Date	Action(s) Imposed	Reason
07/04/2014 12:48	LIMITATION (1 days)	1) Visit cancelled / Limited to non-contact (Current visit).

* Only 1 recent events are listed from a total of 1 events.

SECTION VI - VISITOR / INMATE APPEAL PROCEDURE AND RECEIPT

The visitation rights of an inmate with a particular visitor may be limited or denied only when it has been determined that the exercise of those rights constitutes a threat to the safety or security of visitors or the facility. This may happen only if denying the right to contact visits alone would not reduce this threat. This decision must be based on specific acts committed by the visitor during a prior visit that demonstrates his / her threat to the safety or security of a particular facility, or on specific information received and verified that the visitor plans to engage in acts during the next visit that will be a threat to the safety or security of the facility.

This decision to cancel, limit or deny visits shall be made by the Deputy Warden for Programs, who will provide written notification and specific charges, including the names and the statements of the charging parties, to both the intended visitor and the inmate. The visitor who is affected shall have the opportunity to be heard on the charges face-to-face with the Deputy Warden for Programs, or the Tour Commander if the Deputy Warden for Programs is absent prior to the determination. At the visitor's request, this decision may be reviewed by the Deputy Warden for Programs every thirty (30) days. The name of an informant may be withheld if necessary to protect his / her safety.

Visitors and inmates whose visiting privileges have been canceled, limited or denied by the Department of Correction (DOC) may appeal to the New York City Board of Correction (BOC). Any person who appeals shall give notice in writing to the BOC and to the DOC Commanding Officer. The facility and any person affected by the decision may submit to the BOC, for its consideration, any evidence or relative material relevant to the cited offense and to the cancellation/limitation/denial. The BOC, or the designee, shall issue a written decision upon the appeal within five (5) business days after it has received notice of the requested review.

My signature certify that I have received a copy of the notice of cancellation/limitation/denial with the BOC Minimum Standards Appeal and Complaint form (see Section VII below).

Signature of Visitor / Inmate: _____ Witnessed by: _____ Date: _____

SECTION VII - BOC APPEAL AND COMPLAINT FORM

NYC BOARD OF CORRECTION
51 CHAMBERS STREET
Room 923
NEW YORK, NEW YORK 10007
(212) - 788 7840

BOARD OF CORRECTION
MINIMUM STANDARDS APPEAL AND COMPLAINT FORM

This form should be promptly completed by any prisoner or other person appealing a determination to the Board of Correction relating to a minimum standard. This form should be given to a staff member of the Board of Correction at the facility or mailed to the address above or emailed to BOC@doc.nyc.gov. This form should also be utilized for the purpose of making any complaint or command involving the minimum standards.

DOC FACILITY AND HOUSING AREA: GIMDC (11A)

APPLICABLE STANDARD, INCLUDING SECTION NUMBER: _____

NAME AND BOOK AND CASE NUMBER OF INMATE: ELMO RIVADENIERA BC# 310-1300-714NAME, ADDRESS, PHONE NUMBER OF APPELLANT OTHER THAN INMATE: NIMBA BUTT, 63HILLSIDE LANE, NEW HYDE PARK, N.Y. 11040. 347-512-0258NATURE OF DECISION BEING APPEALED (Attach copy of any written notice or decision provided by DOC): "See Attached"DATE DECISION BEING APPEALED WAS MADE BY DOC: 8/29/2014NAME / IDENTIFICATION OF PERSON(S) WHO MADE DECISION BEING APPEALED: Not StatedREASON FOR APPEALING DECISION OR MAKING COMPLAINT (Attach any applicable written or other materials to be considered in the appeal): on document.Signature: [Signature]Date: 9/3/14

(Please attach additional sheets if you need to provide more information needs to BOC for your appeal)

Distribution: Original - Inmate's Folder Copy - Commanding Officer of SOD (via fax 718-546-7134) Copy - Deputy Warden for Programs (Inmate's facility)
Copy - Inmate Copy - Visitor Copy - Deputy Warden for Security (ONLY IF CONTRABAND FOUND)
Copy - Board of Correction (via fax 212 788-7860)

EXHIBIT “C”

[Print](#)[Close](#)

Visitor Appeal (Please see attached documents)

From: **Nimra Khawaja** (nimrak013@hotmail.com)

Sent: Wed 9/03/14 9:11 AM

To: tglover@boc.nyc.gov (tglover@boc.nyc.gov); BOC@boc.nyc.gov (boc@boc.nyc.gov)

2 attachments

BookScanCenter PAGE 1.pdf (121.8 KB) , BookScanCenter PAGE 2.pdf (154.3 KB)

To whom it may concern,

I'm writing this appeal in regards to a false accusation made upon me in Rikers Island, GMDC facility. My name is Nimra Butt, I'm a 22 year old female. DOB is December 25th, 1991. My address as shown on my picture I.D. is 7547 Exton Street, Darien IL 60561. I currently reside at 63 Hillside Lane, New Hyde Park, N.Y. 11040. I visit my fiancée, soon to be husband at Rikers Island. His name is Elmo Rivadeneira. Booking Case#: 310-1300-714, Housing Area 1UA. On Friday, August 29th, 2014 at approximately 8:30 a.m., officer Capers was collecting everyone's visiting cards ahead of time, while she does her round she checks to see if anyone is wearing anything that is inappropriate in advance. She had told me my outfit was fine before i went inside the room to be checked. However, when i entered the room she informed me that she changed her mind and that i can no longer wear what i had on, & that i would have to change out of it and wear a green shirt. I had asked Capers if I could throw on my black work T-shirt that i always wear when i'm there & take with me as back up just in case. Before i continue, I would like to clarify that I'm not the only female that takes something with her. There are several other females that bring either a top or a bottom because they feel as if the shirts are not clean. After Capers asked me to wear the green shirt, all i asked was if i could wear my own shirt. She raised her voice at me & was rude, but either way i did not leave that room in bad terms with her. I just said Ok & left the room to get a green T-Shirt. When i went upto the front desk to get this shirt, Captain K.M.HALL was standing there & had asked me what happened & why i need the green shirt. I explained everything to her & told her how i always put on my black shirt without any issues. She said: "So you don't want to put on the green shirt, alright you know what, your visit is cancelled, you can have a seat & wait for the next bus". I cried to her & asked why she is doing that to me, but she ignored me & went inside the room where Capers was. Hence, Capers never complained about me, the captain went inside coming out with a paper. I'm not sure if she told Capers to say that, or what may have been the case, but I can assure you, I have never in all these months disrespected anyone on the premises & never would because its just not in my nature. My focus is to only see my fiancée, I would never bring a problem upon myself amongst anyone and put my visits on the line. I do not know any of the females there personally, but nearly all of them saw what happened & said that i was being mistreated & should call 311 as soon as i leave the building. 2 of the girls sitting next to be were so disappointed at what they saw that they got the captains name (K.HALL) & badge number (1107) for me while i was waiting for the bus. We all know right from wrong. I'm being falsely held responsible of saying something so out of order & inexperienced "Fuck you and your green shirt". I would never say that to Capers or anything like that to her or anyone else in the building. I'm obtaining an education & do not use such immature language. A lot of the C.O.'s know me from the building & they know how i

carry myself. My relationship with Capers has always been smooth, iv'e never encountered any issues with her as such before. My visiting history is clean as well. I don't know why they would do such a terrible thing to me, but its not just not right at all. Nothing makes sense. If Caper's is the one that had an issue with me, my visit would have been cancelled on the spot, & i wouldn't have even had the chance to go upto the desk and ask for a shirt. Everything happened after the Captain spoke in between. I was not handed any documents stating that my visits would be cancelled for more than 1 day & neither was I asked to sign anything. Before i left the GMDC building i asked 2 of the CO's about my visiting status (One of them was asked to assist the captain with the paperwork). CO MILLER. He had told me that my visit is only cancelled for that day. (Friday August 29,2014). I confirmed this with him, & the captain did not give me any information or anything of the sort, she just continuously ignored me. When i went back to Rikers Island on (Sunday August 31st,2014), that's when i found out that they also added a cancellation for 45 days. I was and am extremely upset at what has happened & i just want to be able to see my fiancee again, i didn't do anything to deserve this cruel punishment. I am urgently, kindly requesting for your sincere help on this. Sir/Madam, I just want justice for something i never said. I would really respect your help on this matter. 45 days for something i never did is just time that is unbearable. I would understand if i deserved that time but i'm honestly innocent. Please help my side of the story. If you need any more information or would like to further speak to me about this, you can reach me at - (347)-512-0258. Your time is very much appreciated. I hope to hear from your department soon.

Thank You,
Nimra

EXHIBIT “D”

[Print](#)[Close](#)

**FW: City of New York - Correspondence #1-1-1017074251
Message to Agency Head, DOC - Other Agency Complaint
(REF NO. 9-629)**

From: **CONSTITUENT SERVICES** (constituentservices@doc.nyc.gov)
Sent: Fri 9/26/14 10:08 AM
To: 'NIMRAK013@HOTMAIL.COM' (NIMRAK013@HOTMAIL.COM)
Cc: **CONSTITUENT SERVICES** (constituentservices@doc.nyc.gov)

Dear Ms. Butt,

The New York City Department of Correction received your below correspondence, regarding Elmo Rivadeneira (B/C No. 310-13-00714). The Department takes seriously its responsibility to taken action to ensure that this allegation is appropriately investigated.

Thank you for contacting the Department of Correction.

Office of Constituent Services
NYC Department of Correction

-----Original Message-----

From: outgoing agency
Sent: Friday, September 26, 2014 8:41 AM
To: **CONSTITUENT SERVICES**
Subject: City of New York - Correspondence #1-1-1017074251 Message to Agency Head, DOC - Other Agency Complaint

Your City of New York - CRM Correspondence Number is 1-1-1017074251

✕ DATE RECEIVED: 09/26/2014 08:31:23

DATE DUE: 10/10/2014 08:41:14

SOURCE: 3-1-1 Call Center

RELATED SR# OR CASE#: 3101300714

EMPLOYEE NAME OR ID#: N/A

DATE/TIME OF INCIDENT: 09/26/2014 08:31:52

LANGUAGE NEED:

The e-mail message below was submitted to the City of New York via NYC.gov or the 311 Call Center. It is forwarded to your agency by the 311 Customer Service Center. In accordance with the Citywide Customer Service standard, your response is due in 14 calendar days.

If this message is to a Commissioner / Agency Head and needs to be re-routed to another agency or cc to another agency, forward the email to outgoingagency@customerservice.nyc.gov. Do not make any changes to the subject line. Include any comments and it will be processed by the 311 Customer Service Center.

All other web forms are to be handled by the receiving agency.

Message Type:

Topic: Other Agency Complaint

First Name: NIMRA

Last Name: BUTT

Organization:

Apartment Number:

Street Address: 63 HILLSIDE LANE

City: NEW HYDE PARK

State: NY

Postal Code: 11040

Country:

Work Phone #: 3474235290

Email Address: NIMRAK013@HOTMAIL.COM

Message: This is at Rikers Island. A marriage was supposed to happen yesterday. The Officers never brought complainants fiance down for the marriage to be performed. Before that Complainants visiting rights were suspended for 45 days without paperwork, The paperwork received after finding out complainant was suspended had false accusations. Yesterday, all inmates came down to speak with social worker except for complainants fiance. Complainant tried to receive money from inmates account numerous times even after filling out paperwork multiple times.

CITY CONTROLLER

SCOTT STRINGER

THE OFFICE OF THE CONTROLLER, MUNICIPAL
BUILDING, ROOM 608, CENTRE AND
CHAMBERS STREET, NEW YORK, N.Y. 10007

IN SUPPORT OF :

V. RELIEF

A. ISSUE A DECLARATORY JUDGEMENT STATING THAT:

1. THE SEXUALLY INTRUSIVE SEARCH OF THE PLAINTIFF BY DEFENDANTS CAPERS, HALL, HARVEY, DOE #1, AND DOE #2 VIOLATED THE PLAINTIFF'S CLEARLY ESTABLISHED RIGHT UNDER THE FOURTH AMENDMENT TO THE UNITED STATES CONSTITUTION AND CONSTITUTED SEXUAL ABUSE UNDER STATE LAW.
2. DEFENDANTS THE CITY OF NEW YORK AND DOC OFFICIALS FAILURE TO TAKE ACTION TO CURB THE SEXUALLY INTRUSIVE SEARCH PRACTICE ON VISITORS VIOLATED THE PLAINTIFF'S RIGHT UNDER THE FOURTH AMENDMENT TO THE UNITED STATES CONSTITUTION AND CONSTITUTED SEXUAL ABUSE UNDER STATE LAW.

B. AWARD COMPENSATORY DAMAGES IN THE FOLLOWING AMOUNTS:

1. \$100,000 JOINTLY AND SEVERALLY AGAINST DEFENDANTS THE CITY OF NEW YORK, DOC OFFICIALS, CAPERS, HALL, HARVEY, DOE #1 AND DOE #2

C. AWARD NOMINAL DAMAGES IN THE FOLLOWING AMOUNTS:

1. \$100,000 JOINTLY AND SEVERALLY AGAINST DEFENDANTS THE CITY OF NEW YORK, DOC OFFICIALS, CAPERS, HALL, HARVEY, DOE #1 AND DOE #2

D. AWARD PUNITIVE DAMAGES IN THE FOLLOWING AMOUNTS:

1. \$20,000 EACH AGAINST DEFENDANTS THE CITY OF NEW YORK, DOC OFFICIALS, CAPERS, HALL, HARVEY, DOE #1 AND DOE #2

E. GRANT SUCH OTHER RELIEF AS IT MAY APPEAR THAT PLAINTIFF IS ENTITLED

THE FOLLOWING

IN SUPPORT OF :

SUMMONS IN CIVIL ACTION

AO 440 (Rev. 12/09) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

NIMRA BUTT

Plaintiff

v.

Civil Action No.

THE CITY OF NEW YORK

DOC OFFICIALS Defendant

OFFICER CAPERS

OFFICER HALL

OFFICER HARVEY

OFFICER JANE DOE # 1

OFFICER JANE DOE # 2

To: (Defendant's name and address)

SUMMONS IN A CIVIL ACTION

THE CITY OF NEW YORK

1 CENTRE STREET ROOM 1200

NEW YORK, NEW YORK 10007-2341

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

NIMRA BUTT

79 WINDSOR STREET

KEARNY, NEW JERSEY 07032

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 12/09) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

NINRA BUTT

Plaintiff

v.

Civil Action No.

THE CITY OF NEW YORK

D.O.C. OFFICIALS Defendant

OFFICER CAPEN'S

OFFICER HALL

OFFICER HARVEY

OFFICER JANE DOE # 1

OFFICER JANE DOE # 2

To: (Defendant's name and address)

SUMMONS IN A CIVIL ACTION

D.O.C. OFFICIALS (et al)

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

NINRA BUTT

79 WINDSOR STREET

KENNY, NEW JERSEY

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 12/09) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

NIMRA BUTT

Plaintiff

v.

Civil Action No.

THE CITY OF NEW YORK

D.O.C. OFFICIALS Defendant

OFFICER CAPENS

OFFICER HALL

OFFICER HARVEY

OFFICER JANE DOE #1

OFFICER JANE DOE #2

To: (Defendant's name and address)

SUMMONS IN A CIVIL ACTION

OFFICER CAPENS -- G.M.D.C OFFICER FOR VISITS

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

NIMRA BUTT

79 WINDSOR STREET

KENNY, NEW JERSEY

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 12/09) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

NIMRA BUTT

Plaintiff

v.

Civil Action No.

THE CITY OF NEW YORK

D.C. OFFICIALS Defendant

OFFICER GARDEN'S

OFFICER HALL

OFFICER HARVEY

OFFICER JANE DOE #1

OFFICER JANE DOE #2

To: (Defendant's name and address)

SUMMONS IN A CIVIL ACTION

OFFICER K. HALL (#1107) G.M.D.C. CAPTAIN FOR VISITS

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

NIMRA BUTT

79 WINDSOR STREET

KENNY, NEW JERSEY

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 12/09) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

NIMRA BUTT

Plaintiff

v.

Civil Action No.

THE CITY OF NEW YORK

D.C. OFFICIALS Defendant

OFFICER CAPEN'S

OFFICER HALL

OFFICER HARVEY

OFFICER JANE DOE #1

OFFICER JANE DOE #2

To: (Defendant's name and address)

SUMMONS IN A CIVIL ACTION

OFFICER HARVEY - G.I.V.C. CAPTAIN FOR VISITS

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

NIMRA BUTT

79 WINDSOR STREET

KENNY, NEW JERSEY

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 12/09) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

NIMRA BUTT

Plaintiff

v.

Civil Action No.

THE CITY OF NEW YORK

D.O.C. OFFICIALS Defendant

OFFICER CAPEN'S

OFFICER HAN

OFFICER HARVEY

OFFICER JANE DOE #1

OFFICER JANE DOE #2

To: (Defendant's name and address)

SUMMONS IN A CIVIL ACTION

OFFICER JANE DOE #1 - - CONDUCTED FEMALE
SEARCHES IN G.R.U.C.

VISITATION ENTRY

12-1-2014 - 2-1-2014

UNDER CAPTAIN HARVEY

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

NIMRA BUTT

79 WINDSOR STREET

KENNY, NEW JERSEY

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 12/09) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

NIMRA BUTT

Plaintiff

v.

Civil Action No.

THE CITY OF NEW YORK

D.O.C. OFFICIALS Defendant

OFFICER GARDEN'S

OFFICER HAN

OFFICER HARVEY

OFFICER JANE DOE #1

OFFICER JANE DOE #2

To: (Defendant's name and address)

SUMMONS IN A CIVIL ACTION

OFFICER JANE DOE #2 -- CONDUCTED FEMALE
SEARCHES IN G.N.U.C.
VISITATION ENTRY
12-1-2014 - 2-1-2014
UNDER CAPTAIN HARVEY

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

NIMRA BUTT

79 WINDSOR STREET

KEATON, NEW JERSEY

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

THE FOLLOWING
IN SUPPORT OF:

REQUEST TO PROCEED
IN FORMA PAUPERIS

FROM:

Wm. Burt

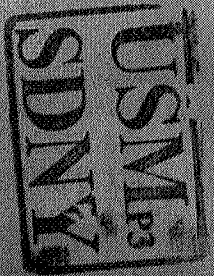
79 Windsor Street

Kearny, NJ. 07032.

7014 2120 0004 2327 5169



CERTIFIED MAIL®



TO:

Pro-se Office

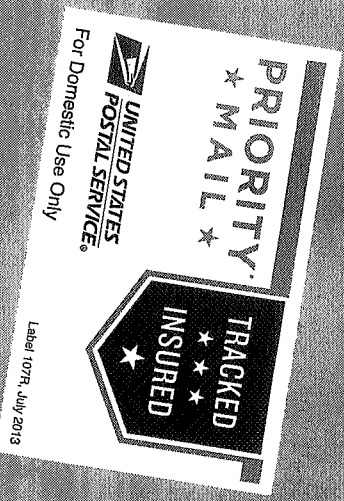
U.S. District Court Southern District Court of New York

Daniel Patrick Maynard

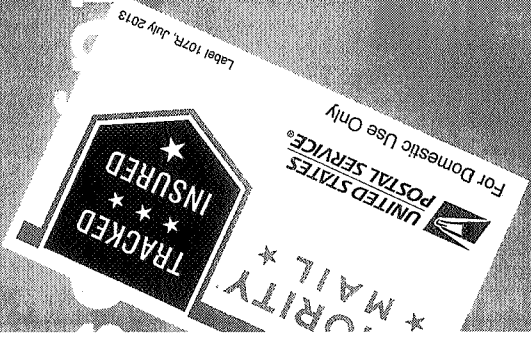
U.S. Courthouse

500 Pearl Street Room 230

New York, New York 10007.



Cushion Mailer
10 1/2" x 16"



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